

## Koch, Kristine

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**From:** Koch, Kristine  
**Sent:** Tuesday, December 23, 2014 4:04 PM  
**To:** Cohen, Lori  
**Cc:** Grandinetti, Cami; Allen, Elizabeth (allen.elizabeth@epa.gov)  
**Subject:** Portland Harbor RI Section 10  
**Attachments:** Rev 1 EPA\_2012-01-13\_DF RI\_Sec 10.1\_Text.doc; Rev 1 EPA\_2012-01-13\_DF RI\_Sec10.2.doc

Lori – Elizabeth and I have completed our review of the LWG’s proposed edits to our modifications to section 10 (attached). Some of the key reasons for our making additional changes are as follows:

- Presented information that was not presented elsewhere in the RI Report.
- Presented information that was not updated consistent with modifications made to other sections of the RI by EPA.
- Presented comparisons of site data to upriver data inappropriately (means of site data to UPL of upriver data). This is not a scientifically valid approach.
- Arbitrarily selected values to define “elevated” concentrations of contamination.

Let me know if you want some specific examples.

I will be transmitting to the LWG shortly.

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